



National Black Chamber of Commerce
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October 3, 2006

Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: FCC Docket #97-80

Dear Commissioners:

On behalf of the 95,000 African-American owned business, the National Black Chamber of Commerce respectfully requests the FCC grant the pending requested waivers to the so-called set-top integration ban.

The FCC rule will force cable providers to lease to consumers set-top boxes that use external "CableCARDS," that have been clearly disfavored by the marketplace. The rule will ban the more popular leasing of boxes that employ integrated security technology. Essentially, both types of boxes do the same thing—they allow consumers to view the content they've purchased. However, the boxes that are dependent on the external CableCARDS could cost consumers somewhere in the region of \$600 million per year.

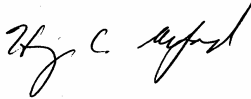
The integration ban is yet another example of needless government regulation that stifles competition and taxes unnecessarily. To make matters worse, consumers will be asked to bear these costs without gaining any new features or capabilities.

In addition, the integration ban will divert investments away from innovations in video and broadband. While the marketplace is clearly moving towards downloadable security software to perform the navigation

and other “security” functions currently performed by existing set-top boxes, CableCARDS leave consumers in a technological time-warp, held back by soon-to-be outdated technology.

For these reasons, the National Black Chamber of Commerce asks that the FCC grant the pending waiver to the set-top “integration ban” to eliminate this burden on the marketplace.

Sincerely,

A handwritten signature in black ink, appearing to read "Harry C. Alford". The signature is fluid and cursive, with the first name "Harry" being more prominent.

Harry C. Alford
President & CEO